UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB) MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and (if applicable) Michael A. Chalenski v. National Football League [et al.],

INJURY LITIGATION

SHORT FORM COMPLAINT

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION

JURY TRIAL DEMANDED

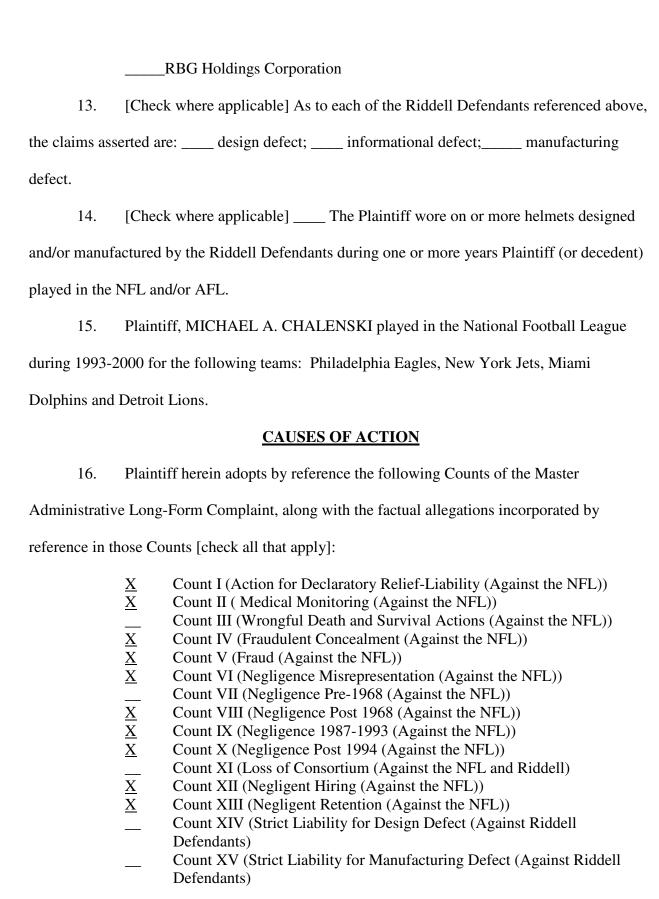
No. 13-cv-05768-AB

SHORT FORM COMPLAINT

- 1. Plaintiff, MICHAEL A. CHALENSKI brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL NO. 2323.
- 2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 2, filed April 26, 2012.
- 3. Plaintiff incorporates by reference the allegations (as designated below) of the Master Administrative Long-Form Complaint, as may be amended, as if fully set forth at length in this Short Form Complaint.
 - 4. NOT APPLICABLE.
- 5. Plaintiff, MICHAEL A. CHALENSKI is a resident and citizen of Medford, New Jersey and claims damages as set forth below.
 - 6. NOT APPLICABLE.

- 7. On information and belief, the Plaintiff sustained repetitive, traumatic subconcussive and/or concussive head impacts during NFL games and/or practices. On information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. On information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.
- 8. The original complaint by Plaintiff in this matter was filed in the United States
 District Court for the Southern District of Florida. If the case is remanded, it should be
 remanded to the United States District Court for the Southern District of Florida.
 - 9. Plaintiff claims damages as a result of [check all that apply]:
 - <u>X</u> Injury to herself/himself.
 - X Injury to the Person Represented
 - __ Wrongful Death
 - Survivorship Action
 - X Economic Loss
 - Loss of Services
 - __ Loss of Consortium
 - 10. NOT APPLICABLE.
 - 11. Plaintiff reserves the right to object to federal jurisdiction.
- 12. Plaintiff brings this case against the following Defendants in this action [check all that apply]:

<u>X</u>	National Football League
<u>X</u>	NFL Properties, LLC.
	Riddell, Inc.
	All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)
	Riddell Sports Group, Inc.
	Easton-Bell Sports, Inc.
	Easton-Bell Sports, LLC.
	EB Sports Corporation



- __ Count XVI (Failure to warn (Against Riddell Defendants)
- __ Count XVII (Negligence (Against Riddell Defendants)
- X Count XVII (Civil Conspiracy/Fraudulent Concealment (Against NFL Defendants)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
 - B. Not applicable;
 - C. For punitive and exemplary damages as applicable;
- D. For all applicable statutory damages of the state whose laws will govern this action;
- E. For medical monitoring, whether denominated as damages or in the form of equitable relief;
 - F. For an award of attorneys' fees and costs;
 - G. An award of prejudgment interest and costs of suit; and
- H. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demands a trial by jury.

Dated: October 24, 2013

Respectfully Submitted:

By: <u>/s/ Bradford R. Sohn, Esq.</u>
Florida Bar No. 98788
BRS@grossmanroth.com
GROSSMAN ROTH, P.A.
925 S. FEDERAL HIGHWAY, SUITE 350
BOCA RATON, FLORIDA 33432

Telephone: (561) 367-8666 Facsimile: (561) 367-0297 Attorneys for Plaintiff